

EXHIBIT-A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

V

STEVEN WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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PLAINTIFF'S RENEWED MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff, American University of Antigua College of Medicine "AUA", and pursuant to Fed. R. Civ. P. 65 moves this Court for entry of a preliminary injunction, for the following reasons:

1. This action arises, in most basic summary, out of Defendant's ownership and publication of a website, and derivative publications including a YouTube.com video channel, containing false and defamatory information about American University of Antigua College of Medicine ("AUA").
2. Plaintiff brought a motion for preliminary injunction once before. (Docket No. 8).

3. However, the Court determined that it was unnecessary to decide Plaintiff's motion in light of Defendant agreeing to replace his website with an "under construction" or "under review" banner. (Docket No. 19).
4. The Defendant recognized that he needed the Court's permission to republish his website, as evidenced by his letter to the Court requesting permission to reverse the internet changes. (Docket No. 12¹).
5. However, Defendant simply republished his website without leave of the Court².
6. Similarly he established a second website devoted to defaming Plaintiff, www.aua-vet.com³
7. Defendant's webpage and associated videos on YouTube contain false and defamatory statements.
8. These sites are presently published on the internet and are open for the public to view.
9. Plaintiff has a strong likelihood of success on the merits on each of its claims.
10. Plaintiff would suffer irreparable injury without and injunction.
11. The issuance of an injunction would not cause substantial harm to Defendant.
12. Additionally the public interest would be served by issuance of injunction.
13. The factors weighing in favor of an injunction weigh heavily and compellingly in Plaintiff's favor.

WHEREFORE, AUA respectfully requests that this Court enter an Order:

- A. Granting AUA's Motion in its entirety;
- B. Enjoining Defendant Steven Woodward, as well as any agent, internet service provider, domain registry and/or website host acting at his direction or request:

¹ This request was not designated as a motion.

² This republication occurred as early as July 23, 2010.

³ This website presently redirects to www.aua-med.com.

1. From all further publication under the internet domain name “www.aua-med.com”
2. From the unlicensed publication, in any manner, of AUA student academic records (other than his own); and
3. From publication of all other contents presently disseminated through his websites www.aua-med.com and www.aua-vet.com including associated YouTube videos by any other means or medium; and

C. Granting AUA any other relief that this Honorable Court deems appropriate.
and requests an adjournment of 60 days such that discovery may be conducted.

Respectfully Submitted,

/s/ Eric A. Buikema (P58379)
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiff’s Renewed Motion for a Preliminary Injunction, Brief in Support of Motion and this Certificate of Service were served upon Steven L. Woodward, Defendant, via his email address Steve_L_woodward@yahoo.com and First Class U.S. mail to Steven Woodward, c/o 7211 Brittwood Lane, Flint, MI 48507 on November 1, 2010.

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